

Submission to Draft Clonmel Local Area Plan 2024-2030

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1. Introduction

This submission to the Draft Clonmel Local Area Plan has been prepared by McCutcheon Halley Chartered Planning Consultants on behalf of [REDACTED], in response to public notices inviting submissions from third parties and interested parties on the Draft Clonmel Local Area Plan 2024-2030.

Our client welcomes the publication of the Draft Clonmel Local Area Plan (LAP) 2024-2030 and the opportunity to participate in the plan making process which will inform the future development of Clonmel town.

This submission requests the following in the forthcoming Clonmel Local Area Plan for [REDACTED]:

- The zoning of [REDACTED] land to be retained for residential use and included within the settlement boundary for Clonmel town.



Figure 1 – [REDACTED]
[REDACTED] Site outlined in red

This submission is structured as follows:

- Site Context
- Planning Policy Context
- Site History
- Rationale for Submission Request
- Conclusion

2. Site Context

The subject site, which is c.3.1 hectares (7.6 acres) in area, is located approximately 2.5km west of Clonmel town centre. The site is bound to north by the Cahir Road which separates the site from the Poppyfield Retail Park to the north. The area surrounding the site is characterised by a mix of residential, retail and agricultural uses, with agricultural lands immediately adjoining the site to the west and south. Gort na Manach residential estate is located immediately to the east. This estate generally comprises detached and semi-detached dwellings.

The site is also strategically located in proximity of the N24 which is located 500m to the northwest of the subject site. Footpath and cycle links are already available along the R707 Cahir Road providing options for sustainable modes of transport for future residents.

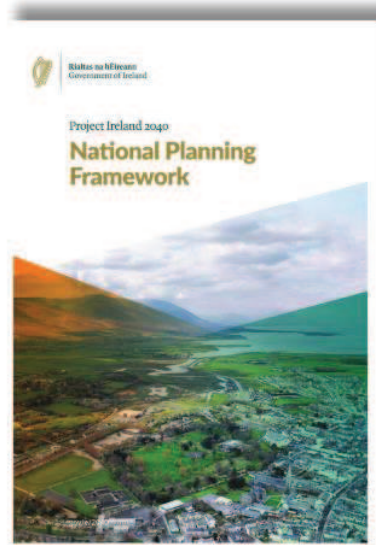


Figure 2 Site context. Site outlined in red

3. Planning Policy Context

3.1 National Planning Framework – Project Ireland 2040

In line with the recommendations set out in Rebuilding Ireland, the Government launched Ireland 2040, which comprises the National Planning Framework (NPF) and National Development Plan (NDP) 2018-2027.



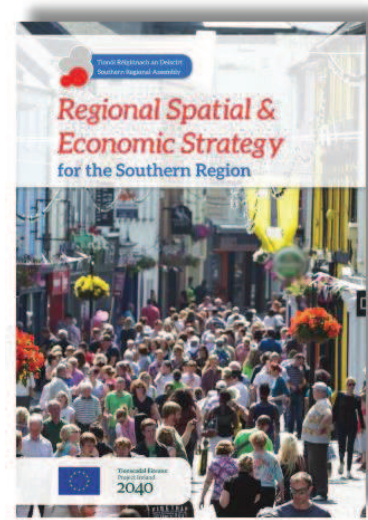
The NPF highlights the urgent requirement for a major uplift of the delivery of housing within the existing built-up areas. According to the NDP, a key tenet to achieving these ambitious housing targets is through compact growth. This compact growth model focuses on the prioritisation of housing development in locations within and contiguous to existing urban footprints where it can be served by public transport, walking and cycling.

The NPF has also acknowledged that Towns need to be developed to be of scale and quality to compete internationally, and to be drivers of national and regional growth. The creation of attractive places to live through quality placemaking initiatives is also directly linked to economic prosperity, and the ability to attract major employers.

In line with the NPF and the CDP, it is planned to deliver a population growth of 30% by 2031 for Clonmel.

3.2 Regional Spatial & Economic Strategy for the Southern Region (RSES)

The RSES is a strategic document, which identifies high-level requirements and policies for the Southern Region for the period 2019-2031. The RSES provides a long-term regional level strategic planning and economic framework, in support of the implementation of the National Planning Framework, for the future physical, economic and social developments for the Southern Region.



The RSES identifies Clonmel as one of six Key Towns that are major centres for delivery of public services and are self-sustaining regional drivers with Clonmel being a key support role to Waterford.

3.3 Tipperary County Development Plan 2022-2028

In the settlement hierarchy of the Tipperary County Development Plan 2022 (TCDP), Clonmel is identified as a ‘Key Town’ which acts as a regional level economic driver.

Clonmel is strategically located on the Waterford-Limerick N24 and rail corridor and is a major employment centre with a highly skilled workforce of 6,970. It is stated that the Council will support the role of Clonmel as a location for largescale industry, including life-sciences, food production and manufacturing, third-level education and as a **strong and attractive residential centre.**

The Core Strategy outlines a population and housing projection and a maximum residential land zoning allocation for the towns. It is also stated that a detailed assessment and review of land zoning will be carried out in line with the NPF Methodology for a Tiered Approach to Land-zoning to inform the preparation of new LAPs.

Section 2.5.3 of the Draft Plan relates to **Population Growth and Distribution**. The NPF prescribes population targets for each Region, and County targets are provided in the Implementation Roadmap for the NPF, (DHPLG 2018). Tipperary has a targeted population growth of 24,500 additional persons from 2016 to 2031 as shown below in table 2.2.

Table 2.2: Tipperary Population trends and projections from the NPF Roadmap						
Year	2002	2006	2011	2016	2026	2031
Population	140131	149244	158754	159553	177000	184,000

Table 1 – Extract taken from CDP

The ‘Housing Supply Target Methodology for Development Planning Section 28 Guidelines for Planning Authorities’ (DHLGH 2020) sets out a requirement for an integrated approach to projecting new household demand.

The population increases for the settlements is included in Table 2.4 (Core Strategy) from the 2022 TCDP – see Table 2 below.

Table 2.4: Core Strategy Table							
Typology	Settlement	Population 2016	Population increase to 2031 ¹⁰	Population projection 2028	Additional persons to 2028	% population growth share	Housing Requirement to 2028
Urban Growth 66%							
Key Town and Self-Sustaining Regional Driver	Clonmel	17140	22282	20568	3428	21.0	1270

Table 2 – Extract taken from CDP

However, since the publication of the final CDP, the CSO have published statistics relating to Census 2022. Clonmel is the largest town in Tipperary with a population of 18,369 according to Census 2022. Taking this into account, we can say that over the lifetime of the CDP Clonmel is targeted to grow by a further 2,199 people and 3,559 by 2030.

In this context, if we consider the average household size, adopted by Tipperary County Council for the CDP of 2.7, an additional 814 units need to be built in Clonmel within the lifetime of the CDP and 1,318 units by 2030.

It is stated that the Core Strategy will deliver 59% of new population and housing provision to the urban centres, and 41% to the rural settlements and the wider rural areas, thereby refocusing new growth on a sustainable settlement strategy for the county (refer to Chapter 4 Settlement Strategy). Noting the importance of compact development, the Core Strategy requires **at least 30% of all new homes that are targeted in settlements, to be located within the existing built-up footprint of the settlements.**

3.4 Draft Clonmel and Environs Local Area Plan 2024-2030

The Draft Clonmel and Environs Local Area Plan 2024-2030 was published to invite public consultation ahead of the final draft. The LAP is focused on a renewed and targeted approach to compact growth and regeneration, with the town centre as the heart and focal point of Clonmel.

As outlined in the LAP, the policy of supporting new development that will enable sustainable housing growth, employment, community development and prosperity for Clonmel is identified in Policy 2.2. Moreover, Policy 2.4 states the following;

“Support and permit compact residential growth in Clonmel through the sustainable intensification and consolidation of the town centre and established residential areas to meet identified housing targets and requirements in line with the Sustainable Residential Development in Urban Areas,

Guidelines for Planning Authorities (DEHLG, 2009) and any review thereof."

Objective 2B and 2D outline the LAPs main objectives relating to the provision of residential development over the lifetime of the Plan.

2B - Support and facilitate the development of lands in collaboration with landowners and service providers for residential and employment development over the lifetime of the LAP.

2D - Monitor the scale, type, tenure and location of constructed and permitted developments in Clonmel to ensure compliance with the Core Strategy and to achieve the delivery of strategic plan-led and coordinated balanced development within the town.

Section 5.2 of the LAP further expands on the Plan's vision for the provision of residential development for Clonmel between 2024-2030. A key aim of the LAP is to reverse the decline of the town centre as a living neighbourhood and encourage new development in the town centre and adjoining area, supporting compact growth.

The town is divided into six distinct sections as outlined in Figure 3 below. Our client's lands are located in 'West of Town Centre'.

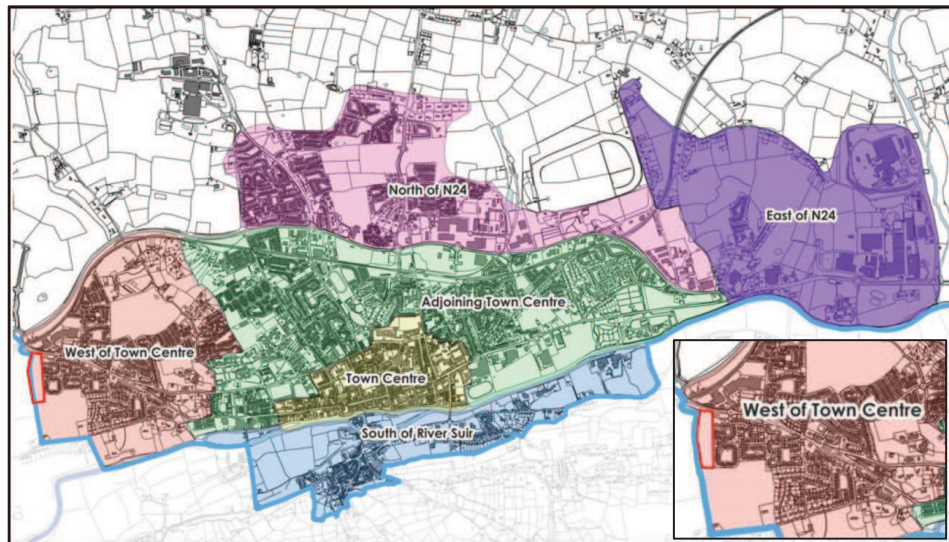


Figure 3 – Residential Neighbourhoods of Clonmel identified by Draft LAP. Site highlighted in red in 'West of Town Centre'

The LAP has carefully considered the sites located in all of these six residential neighborhoods with regards to the provision of new development. According to the LAP, "a significant proportion of new residential development to be delivered in the lifetime of this LAP will be in this neighbourhood, specifically on the western side of Glenconnor Road, lands east of Wheatfields and land **southwest of Poppyfields.**"

These lands are also well positioned in terms of future access to active travel measures with the LAP stating that, “all residential areas in this neighbourhood feed into the R707 Cahir Road, the main arterial road into the town centre from the west. The LAP supports the Local Transport Plan in putting in place walking, cycling and public transport options from this area to the town centre.”

As part of the Draft Clonmel LAP, it is proposed to zone the site as R1 ‘New Residential’ where it is an objective to “provide for new residential development.” New residential areas/town extensions must ensure the provision of high-quality connections in new residential environments and provide an appropriate mix of house sizes, types and tenures in order to meet household needs and to promote balanced communities

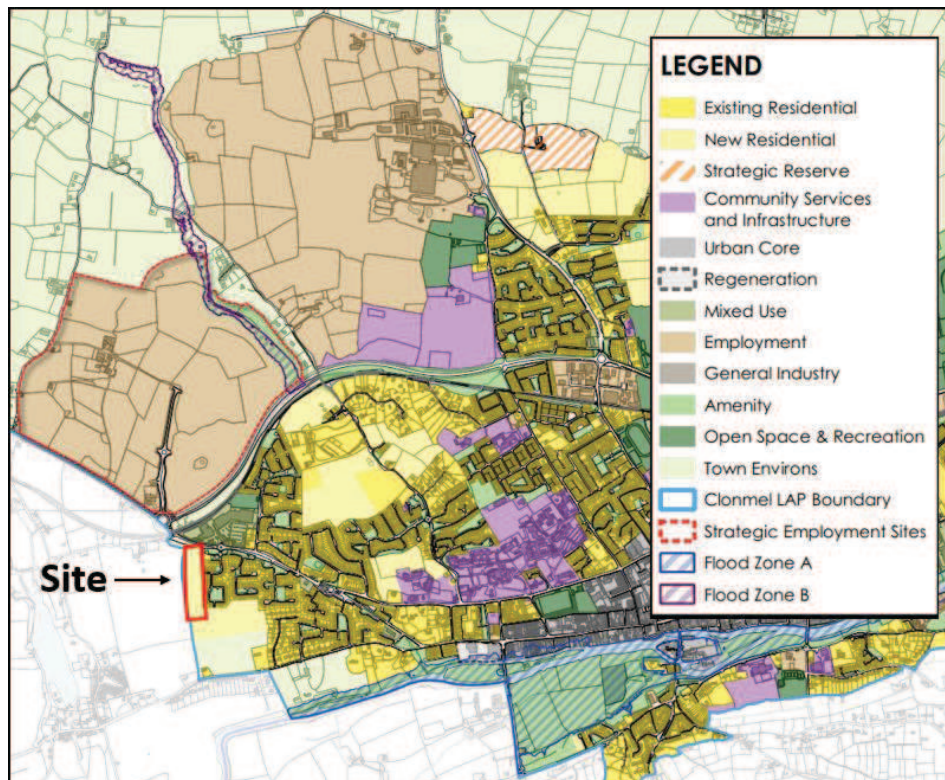


Figure 4 – Subject site located within land-use zoning of ‘New Residential’ as per the Draft LAP

The lands are located along a privately run bus-service which serves the town of Clonmel and is run by [REDACTED]. The route serves Poppyfields Retail Park and travels to the town centre. The service operates on a 1-hour frequency. In addition, the site is located approximately 3km from Clonmel Train Station, which offers connections to Dublin Heuston, Waterford and Limerick Junction.

4. Planning History

■■■■■■ lands have been subject to three separate planning applications with proposals for new residential development.

**Tipperary County Council Reference No. ■■■■■■ and ■■■■■■
■■■■■■**

In August 2019, Tipperary County Council granted permission for the construction of 74 no. residential units and all associated ancillary development works including connection to all public services, vehicular and pedestrian access, parking, footpaths, drainage, landscaping and amenity areas at Abbey Farm, Inishlounaght and Ballingarrane South, Cahir Road, Clonmel, Co. Tipperary.

The decision to grant the application by Tipperary County Council was subsequently appealed to An Bórd Pleanála. The Board opted to refuse permission on the site due to concerns regarding the layout of the proposal and what they considered to be a low-density proposal for the site.

Tipperary County Council Reference No. ■■■■■■

In March 2007, Tipperary County Council granted permission for the construction of 65 houses consisting of 10 detached houses, 46 semi-detached houses and 9 terraced townhouses and all associated site works at Abbey Farm, Clonmel.

Tipperary County Council Reference No. ■■■■■■

In April 2000, Tipperary County Council granted permission for the construction of 27 no. houses and site development and external works at Inishlounaght, Cahir Road, Clonmel.

5. Rationale for Submission

Our client welcomes the recognition of their lands being designated as New Residential in the Draft Clonmel Local Area Plan. The purpose of this submission is to ensure that our client's land be retained for residential use and included within the settlement boundary for Clonmel town in the forthcoming Clonmel Local Area Plan 2024.

5.1 Suitability of Site for residential development

The subject site is currently zoned for residential development and is located within close proximity of a range of existing services and facilities with easy access to sustainable modes of transport.

As part of the Draft Clonmel LAP, it is proposed to zone the site as R1 'New Residential' where it is an objective to "provide for new residential development." New residential areas/town extensions must ensure the provision of high-quality connections in new residential environments and provide an appropriate mix of house sizes, types and tenures in order to meet household needs and to promote balanced communities.

The subject site at Abbey Farm, Inishlounaght and Ballinagarrane South, Cahir Road, Clonmel is strategically located in proximity of Clonmel Town Centre and a range of services and facilities including schools, a hospital, medical centres, churches, post offices, childcare facilities, convenience shops, retail units, community centres, public houses and several amenities.

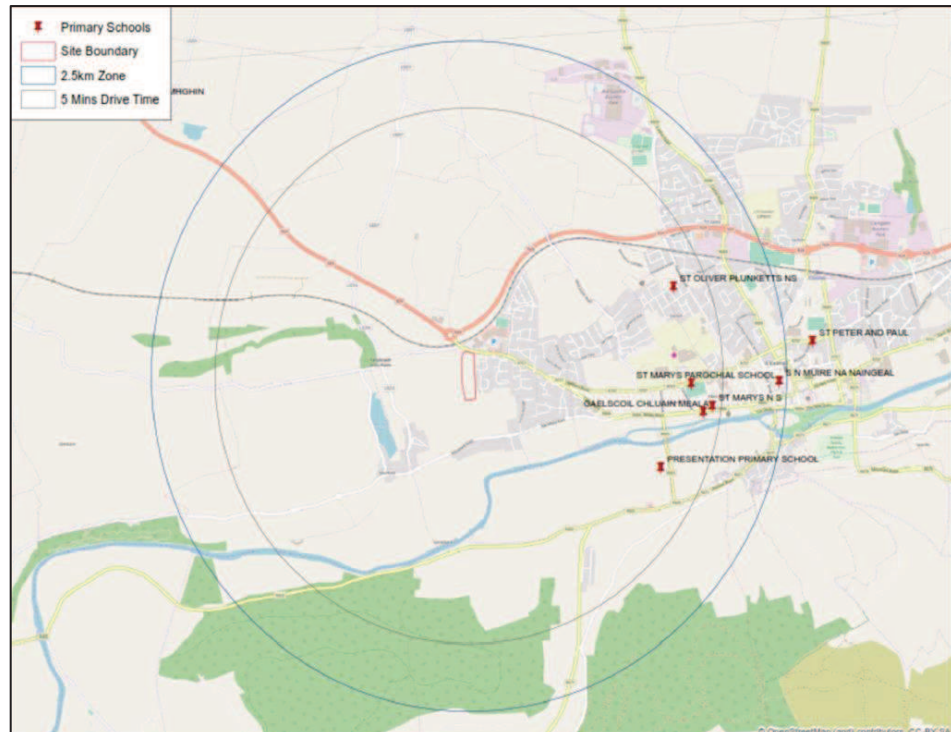


Figure 5 Location of site in context of primary schools

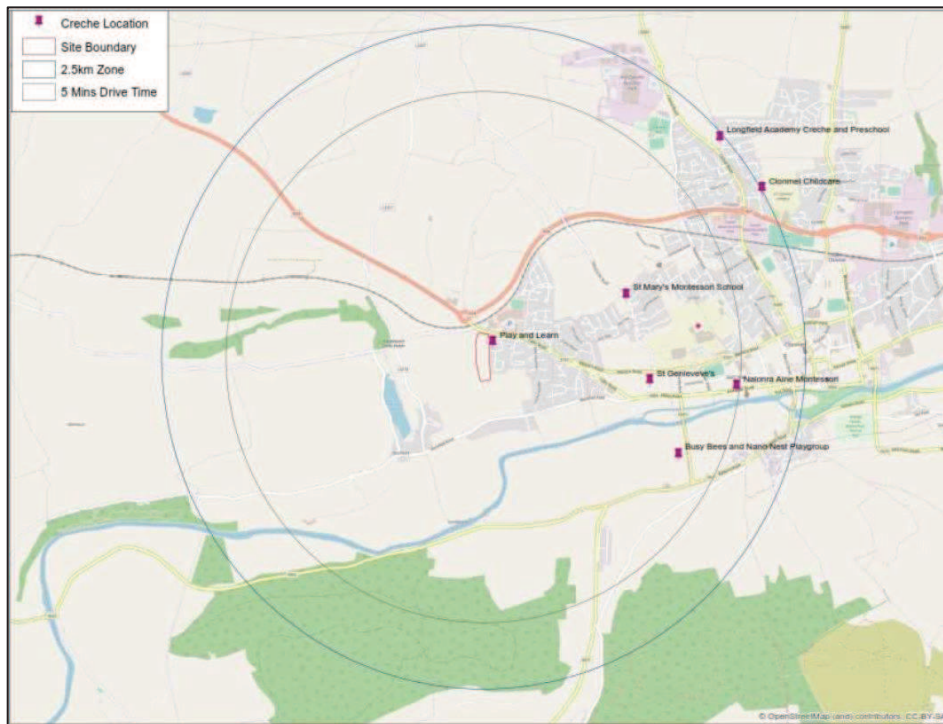


Figure 6 Location of site in context of childcare facilities

In terms of public transport, there is a dedicated local bus service run by [REDACTED] which offers two internal town service routes, one of which serves Poppyfields Retail Park, with a pickup from Gladstone Street at the town centre. The service commences at 9.30am from Gladstone Street with a final pick-up time at 17.44pm from Poppyfields. The bus stop is approximately 5 minutes' walk from the site, located within Poppyfields Retail Park.



Figure 7 Location of bus stops relative to site location

The railway station offers services from Clonmel to Dublin Heuston, and Waterford - Limerick Junction via Clonmel. At Limerick it is possible to avail of connections to Cork City. The train station in Clonmel is located to the north-east of the site, just off Prior Park Road (R689).

It is imperative that the forthcoming development plan is cognisant of the important role Clonmel will play in the future in accordance with National guidance and the Tipperary County Development Plan. It will be critical that the new core strategy sets robust policy guidance to ensure sufficient land is available to meet the projected increase in market demand.

Our client's site, is available and deliverable and will provide the opportunity to design residential development that prioritises walking, cycling and public transport and reduces car dependency, as well as contributing to local infrastructure improvements. This is in line with key national objectives to achieve compact and sustainable led growth.

Section 2.5 of the Tipperary Development Plan advises that lands zoned for residential development must provide an *"evidence-based rationale for the land proposed to be zoned for residential development, having regard to the capacity of existing zoned land, and the phasing of development taking account of the location of public transport and services"*. We have therefore outlined our rationale for retaining the site zoning under the following headings:

1. Need
2. Policy Context
3. Capacity of Water
4. Roads Infrastructure
5. Supporting Infrastructure and Facilities
6. Physical Suitability
7. Sequential Approach
8. Environmental and Heritage Policy

1. Need

In terms of need, the Draft Plan notes that there will be a requirement to provide an extra 1,772 housing units by 2030 to cater for the projected population of 22,282 persons by 2031. By retaining our client's landholding for residential development, this will allow for Clonmel to meet the housing targets as set out in the Draft Plan.

Population 2016	Projected Population 2031	Projected Population 2030	Housing requirement 2030
17,140	22,282	21,928	1,773 units (approx.)

Figure 8 Extract from Draft LAP

2. Policy

As noted above, it is proposed to zone the site as R1 'New Residential' where it is an objective to *"provide for new residential development."*

3. Capacity of Water

The site at Abbey Farm, Inishlounaght and Ballinagarrane South, Cahir Road, Clonmel has access to the existing foul and storm water drainage and can cater for immediate residential development. A new surface water system can be provided for the development site and pass through interceptors before discharging.

4. Roads Infrastructure

In relation to the strategic road's infrastructure, the R707 has been subject to recent upgrades with other routes in the area also benefitting from infrastructure improvements. The site is also located within close proximity of the N24 providing direct access to several locations in Tipperary, Waterford and Limerick.

All roads in the area are of sufficient width and can cater for additional traffic resulting from the development of the subject lands.

5. Supporting Infrastructure and Facilities

As noted above, the site is located in proximity of a number of services and facilities.

6. Physical Suitability

Our clients' lands have a number of advantages that make them ideally suited for residential development. The lands are reasonably flat in nature, have access to existing services and infrastructure to facilitate an immediate delivery of residential development and there is easy access to the R707, bus services and the N24.

7. Sequential Test

The lands lie adjacent to the existing development of Gort na Manach making the subject lands a natural progression for the development of the area. The subject site will integrate and successfully link existing and proposed future development sites providing for a compact development form, which maximises strategic locational benefits.

8. Environmental and Heritage Policy

The site is not affected by any environmental and/or heritage designations and therefore is eminently suitable for development.

We therefore request that the zoning of our client's land be retained for residential use as part of the forthcoming Clonmel Local Area Plan.

5.2 Prioritisation of Residential Zoned Land

The draft plan has zoned 96.04ha for new residential development and notes that the target of 1,773 new units is required by 2030 to cater for the 21,928 projected people to be residing in the town. However, it should be taken into consideration that all of this land may not be developer owned or readily available to progress to planning stage to deliver housing within the lifetime of the development plan.

The subject lands, which have previously been given a grant of permission by Tipperary County Council for the provision of 74 no. residential units, has correctly retained its zoning for 'New Residential' development. The Draft LAP outlines that lands 'West of Town Centre' and in particularly lands southwest of Poppyfields, where the lands are located, are considered appropriate for new residential development, with access to Active Travel and public transport which link the area with the town centre.

The below Figure, taken from the Draft LAP, highlights the location of these lands in the context of the Compact Growth Area, Cycling Proximity to the Town Centre, Bus Stops, Educational Institutions, Key Job Locations and Key Services.

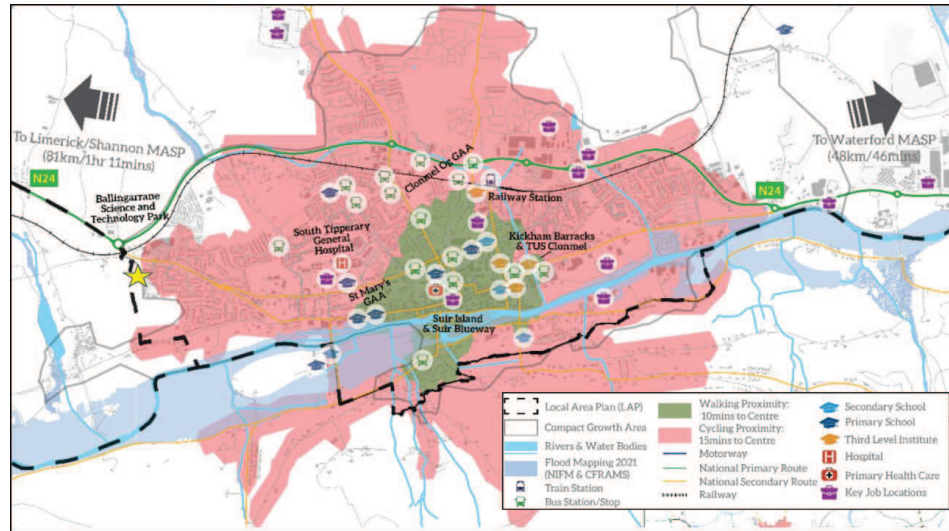


Figure 9 – Location of site in context of Town Profile Map as per Clonmel LAP. Site denoted by yellow star

Considering all of the above, we support the decision taken by Tipperary County Council to designate our client’s lands as ‘New Residential’ for the lifetime of the Plan.

The subject site represents an area of underutilised land which is readily available for development. The site is also one of the few sites available which has the potential to accommodate residential development. Retaining the zoning of the land would be consistent with the vision of the Draft Plan which seeks to increase population growth by 30%.

By zoning this land for ‘New Residential’ under Objective R1 where it is an objective to provide for new residential development, Clonmel will achieve its population and housing targets to 2030 to take its place as one of six Key Towns that is a major centre for the delivery of public services and is a self-sustaining regional town.

We therefore request that the zoning of client’s lands be retained for residential use within the forthcoming Clonmel Local Area Plan.

5.3 Supporting Infrastructure

The accessibility of new development, both in terms of access to services and existing and proposed transport routes should be a key principle in terms of zoning lands for development in the forthcoming development plan. Our client’s site has access to existing foul and storm water drainage and can cater for immediate residential development.

The lands benefit from access to public transport links and Active Travel and a range of services and facilities which are accessible to the site, as illustrated in the Figure below.



Figure 10 – Location of site in proximity to amenities and services both in the immediate vicinity and in the nearby Town Centre

The subject site is well served for pedestrians with pedestrian footpaths existing along the Cahir Road. A cycle facility is also provided for along the Cahir Road connecting to other locations in the town. The footpath network extends the full length of the Cahir Road connecting the site to Clonmel Town Centre.

We therefore request that the zoning of client's lands be retained for residential use within the forthcoming Clonmel Local Area Plan.

6. Conclusion

The Draft Clonmel and Environs Local Area Plan has outlined its vision for planning and future development of Tipperary's largest town, between 2024-2030 and follows the adoption of the Tipperary County Development Plan 2022-2028.

The Draft LAP outlines the population targets for Clonmel between now and 2030 and the required number of residential units to meet this demand. As well as providing residential units for the future population targets of Clonmel, the Council will be acutely aware of the need to ensure a steady delivery of residential units to serve the existing population in Clonmel and their needs and requirements, in the context of the ongoing housing crisis. Taking this into account, the Council have appropriately zoned land suitable for new residential development within the existing built-up area of the settlement of Clonmel.

Our client's lands are one such example of land that has been designated a land-use zoning of 'New Residential', with the aim of delivering residential units on site. We welcome the decision made by the Council to retain the zoning of this land for new residential purposes considering the context in which the site is located with regards to proximity to Clonmel Town Centre

and nearby facilities, services and amenities, and the planning history associated with the site.

Our client looks forward to working with Tipperary County Council over the lifetime of the CDP and the Draft LAP in developing these lands for residential purposes and ensuring that new homes are made available for both existing and prospective residents of Clonmel.